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ATTORNEYS FOR CANADIAN RECEIVER

**IN THE UNITED STATES BANKRUPTCY COURT  
 FOR THE NORTHERN DISTRICT OF TEXAS  
 WICHITA FALLS DIVISION**

<b>In re:</b>	§	
	§	<b>Case No. 19-33868-15</b>
<b>EAGLE ENERGY INC.</b>	§	
	§	<b>Chapter 15</b>
<b>Debtor in a foreign proceeding.</b>	§	<b>Joint Administration Requested</b>
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<b>In re:</b>	§	
	§	<b>Case No. 19-33869-15</b>
<b>EAGLE ENERGY TRUST</b>	§	
	§	<b>Chapter 15</b>
<b>Debtor in a foreign proceeding.</b>	§	<b>Joint Administration Requested</b>
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<b>In re:</b>	§	
	§	<b>Case No. 19-33870-15</b>
<b>EAGLE ENERGY HOLDINGS INC.</b>	§	
	§	<b>Chapter 15</b>
<b>Debtor in a foreign proceeding.</b>	§	<b>Joint Administration Requested</b>
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<b>In re:</b>	§	
	§	<b>Case No. 19-70333-15</b>
<b>EAGLE HYDROCARBONS INC.</b>	§	
	§	<b>Chapter 15</b>
<b>Debtor in a foreign proceeding.</b>	§	<b>Joint Administration Requested</b>
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**UNSWORN DECLARATION UNDER PENALTY OF PERJURY OF ATTORNEY IN  
SUPPORT OF RECEIVER'S EMERGENCY EX PARTE APPLICATION FOR  
TEMPORARY RESTRAINING ORDER AND RELIEF PURSUANT TO  
SECTIONS 105(A) AND 1519 OF THE BANKRUPTCY CODE**

1. "My name is Steve A. Peirce. I am over the age of twenty-one (21) years of age, have never been convicted of a felony or crime involving moral turpitude, and am competent in all respects to make this affidavit. I am an attorney (pro hac vice application pending) for FTI Consulting Canada Inc. ("FTI") solely in its capacity as court-appointed receiver (the "Receiver") of (1) Eagle Energy Inc. ("Eagle Energy"), (2) Eagle Energy Trust ("Eagle Trust"), (3) Eagle Energy Holdings Inc. ("Eagle Holdings"), and (4) Eagle Hydrocarbons Inc. ("Eagle US") (collectively, "Eagle" or "Debtors").

2. The Receiver is the Movant with respect to the *Receiver's Emergency Ex Parte Application For Temporary Restraining Order And Relief Pursuant To Sections 105(A) And 1519 Of The Bankruptcy Code* ("Application"), which was filed contemporaneously with this declaration. As stated in the Notice of Hearing for the Application, the Application has been set for hearing for Friday, November 22, 2019, at 1:30 p.m. (prevailing Central time) before the Honorable Judge Harlin D. Hale, Earl Cabell Federal Building, United State Courthouse, 1100 Commerce Street – 14th Floor, Courtroom #3, Dallas, Texas 75242.

3. Among other things, the Application seeks relief under 11 U.S.C. § 1519 and a temporary restraining order against collection or other self-help efforts by the above-captioned debtors' creditors.

4. On November 21, 2019, I or someone with my firm directed that the Application and Notice of Hearing regarding same be served by Noticing Agent Stretto on parties in interest in this case overnight service. Proof of such service will be filed with the Court.

5. In addition, on November 21, 2019, the following parties were served with a copy of (1) the Application with Proposed Order, (2) supporting Unsworn Declaration Under Penalty Of Perjury Of Foreign Counsel, (3) supporting Unsworn Declaration Under Penalty Of Perjury Of Receiver, (4) Notice of Hearing regarding the Application, and (5) Receiver's Witness And Exhibit List For November 22, 2019 Hearing by the method indicated below.

<b>Name</b>	<b>Method</b>	<b>Email or Fax Number</b>	<b>Comment</b>
Chris Simard Bennett Jones law firm 4500 Bankers Hall East, 855 - 2nd Street SW, Calgary, AB, T2P 4K7	email	<a href="mailto:simardc@bennettjones.com">simardc@bennettjones.com</a>	Canadian Attorney for Debtors
Kelly J. Bourassa Nick Tropak Dan McLeod Jaye Stewart Morgan Crilly	email	<a href="mailto:Kelly.bourassa@blakes.com">Kelly.bourassa@blakes.com</a> <a href="mailto:nick.tropak@blakes.com">nick.tropak@blakes.com</a> <a href="mailto:Daniel.mcleod@blakes.com">Daniel.mcleod@blakes.com</a> <a href="mailto:jaye.stewart@blakes.com">jaye.stewart@blakes.com</a> <a href="mailto:morgan.crilly@blakes.com">morgan.crilly@blakes.com</a>	Canadian Attorney for secured creditor White Oak
Paul Heath Cris Dewar Ryan Hunsaker Matt Pyeatt	email	<a href="mailto:pheath@velaw.com">pheath@velaw.com</a> <a href="mailto:cdewar@velaw.com">cdewar@velaw.com</a> <a href="mailto:rhunsaker@velaw.com">rhunsaker@velaw.com</a> <a href="mailto:mpyeatt@velaw.com">mpyeatt@velaw.com</a>	US Attorney for secured creditor White Oak Financial
Kyle Landau Joshua Sheppard Craig Fuller	email	<a href="mailto:klandau@whiteoaksf.com">klandau@whiteoaksf.com</a> <a href="mailto:JSheppard@whiteoaksf.com">JSheppard@whiteoaksf.com</a> <a href="mailto:cfuller@whiteoaksf.com">cfuller@whiteoaksf.com</a>	Secured creditor White Oak
Howard Gorman	email	<a href="mailto:howard.gorman@nortonrosefulbrig ht.com">howard.gorman@nortonrosefulbrig ht.com</a>	Canadian Attorney for Receiver
Edward M. Wilhelm Wilhelm Law Firm Attorney at Law 5524 Bee Cave Rd., Ste B-5 Austin, Texas 78746	email	<a href="mailto:ewilhelm@wilhelmlaw.net">ewilhelm@wilhelmlaw.net</a>	Plaintiff's attorney in Billy J. Perryman v. Eagle Hydrocarbons Inc. and Salt Flat Acquisition LLC Cause no. 18-0-547 in the district court of Caldwell county, Texas 421st Judicial

			District
Mark Waite DLA Piper LLP (US) 1000 Louisiana, Suite 2800 Houston Texas 77002		<u>Mark.Waite@dlapiper.com</u>	Defendant's attorney in Billy J. Perryman v. Eagle Hydrocarbons Inc. and Salt Flat Acquisition LLC Cause no. 18-0-547 in the district court of Caldwell county, Texas 421st Judicial District
Lisa Lambert (United States Trustee)	email	<u>Lisa.L.Lambert@usdoj.gov</u>	
Erin Schmidt (United States Trustee)	email	<u>Erin.Schmidt2@usdoj.gov</u>	

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct to the best of my information and belief.

Executed this 21 day of November, 2019

By:



Steve A. Peirce, Attorney for  
Receiver (pro hac vice application  
pending)